

The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
**William A. Hinton State Laboratory Institute**  
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK  
GOVERNOR

TIMOTHY P. MURRAY  
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD  
SECRETARY

JOHN AUERBACH  
COMMISSIONER

Spencer Lord, ADA

Suffolk County District Attorney's Office

By e-mail

December 21, 2011

Re: Comm. v. [REDACTED] State Lab no. [REDACTED]

ADA Lord,

Please find below a discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Boston Police
- 3) the inventory control card
- 4) the Drug Powder Analysis Form
- 5) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Annie Khan operated the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler  
Senior Chemist

Cc: Annie Khan

## Curriculum Vitae

Michael Lawler

### **Education:**

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

### **Experience:**

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits. Lab Safety Officer.

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

### **Additional education and special training**

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court Current Drug Trends – Multijurisdictional Drug Task Force Academy

CDC course in antibiotic resistance CDC course in cell culture

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

### **Journal Publications**

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

### **Professional Affiliations**

Northeastern Association of Forensic Scientists (NEAFS) since 2005

### **Awards**

Theobald Smith Education Grant for graduate studies

## Curriculum Vitae

Annie Khan (Dookhan)

**Education:**

University of Massachusetts, Boston, Ma, Master of Science in Chemistry.  
University of Massachusetts, Boston, Ma, Bachelor of Science in Biochemistry.

**Experience:**

2003 – present

Chemist I, II, Massachusetts Department of Public Health, Drug Analysis Laboratory

- \*Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.
- \*Appointed Assistant Analyst by Assistant Commissioner of Public Health, 2004.
- \*Responsible for the identification of illicit drugs to determine violations of harmful and narcotic drug laws.
- \*Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.
- \*Maintenance and repairs of all analytical instruments.
- \*Responsible for the Quality Control of all analytical instruments, reagents and controls/standards.
- \* Responsible for the Quality Control/Quality Assurance program for the drug lab.
- \*Notary Public.
- \*Qualified as an expert witness in Massachusetts Courts and U.S. District Court

2001 – 2003

QC Analyst I, II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

- \*Completed proficiency training conducted by a member of the staff within the MLB Quality Control and Quality Assurance Department.
- \*Method Development for creating new techniques and enhancing vaccines for the QC Dept. and FDA.
- \*Writing, revising and reviewing Standard Operating Procedures (SOPs).
- \*Trained and supervised new chemists and interns for the department.
- \*Routine QC testing of products for the FDA.
- \*Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.
- \*Calibration, preventive maintenance, QC and QA of analytical instrumentation.
- \*Complete testing of chemicals for Vendor Validation Project for the FDA.
- \*Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

**Additional Training:**

Dept. of Justice – Forensics Professionals, (numerous trainings)  
GLP/GMP course with Massachusetts Biologic Laboratory.  
QC/QA training according to FDA Codes and Regulations.  
GC and GC/MS courses with Agilent Technologies and Restek.  
HPLC course with Waters Cooperation.  
FTIR course with Spectros.  
TOC training with MBL and Sievers.

**Association:**

American Chemical Society (ACS)  
Northeastern Association of Forensics Science (NEAFS)



## **DRUG RECEIPT**

CC #

BOOK # 63

PAGE # 165

**DESTRUCTION #**

District/Unit A-1 / DCU

Name & Rank of Arresting Officer S/I Wm DWAN ID# 10060

**To be completed by ECU personnel only**

Name and Rank of Submitting Officer Sgt. V. White ID# 11064

Received by  Date 12-31-10

ECU Control # \_\_\_\_\_

No. [REDACTED]

Date Analyzed: 01-11-11

City: Boston D.C.U. Police Dept.

Officer: P.O. SYBIL WHITE

Def: [REDACTED]

Amount:

Subst: SUB

No. Cont: 2 Cont: pb

Date Rec'd: 12/31/2010

No. Analyzed: 1

Gross Wt.: 1.78 ✓

Net Weight: 0.13

# Tests: 9/11  
• 2 ASD

Prelim:

Cocaine (K)

Findings: cocaine

Get me  
Follows

(-11-11)

DRUG POWDER ANALYSIS FORM

SAMPLE #

AGENCY

ANALYST

No. of samples tested:

Boston

JK

Sharehee & Sater

Evidence Wt.

1.78

PHYSICAL DESCRIPTION:

2pb corners with sn3

Gross Wt ( ): 0.3126

Gross Wt ( ): \_\_\_\_\_

Pkg. Wt: \_\_\_\_\_

Net Wt: 0.1316

0.1316 2334 1.6-11

20g = 19.9998

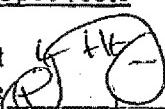
10g = 9.9998g

5g = 5.0000g

1g = 1.0000g

PRELIMINARY TESTS

Spot Tests

Cobalt Thiocyanate 

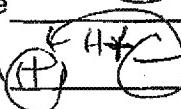
Marquis

Froehde's

Mecke's

Microcrystalline Tests

Gold Chloride 

TLTA 

OTHER TESTS

PRELIMINARY TEST RESULTS

RESULTS \_\_\_\_\_

DATE \_\_\_\_\_

GC/MS CONFIRMATORY TEST

RESULTS COCAINE

MS OPERATOR ASD

DATE (-11-11)

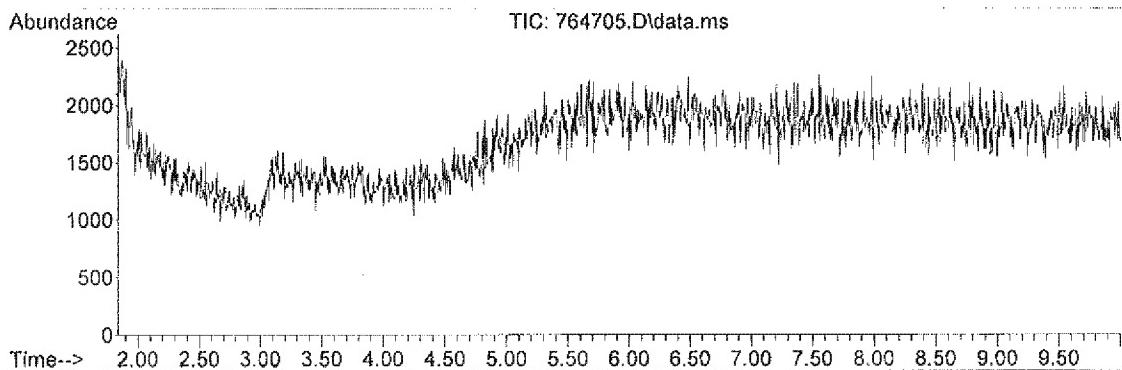
Area Percent / Library Search Report

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Information from Data File:

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Operator : ASD/DJR  
Date Acquired : 10 Jan 2011 10:32  
Sample Name : BLANK  
Submitted by :  
Vial Number : 1  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

ASO  
12-21-11



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Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

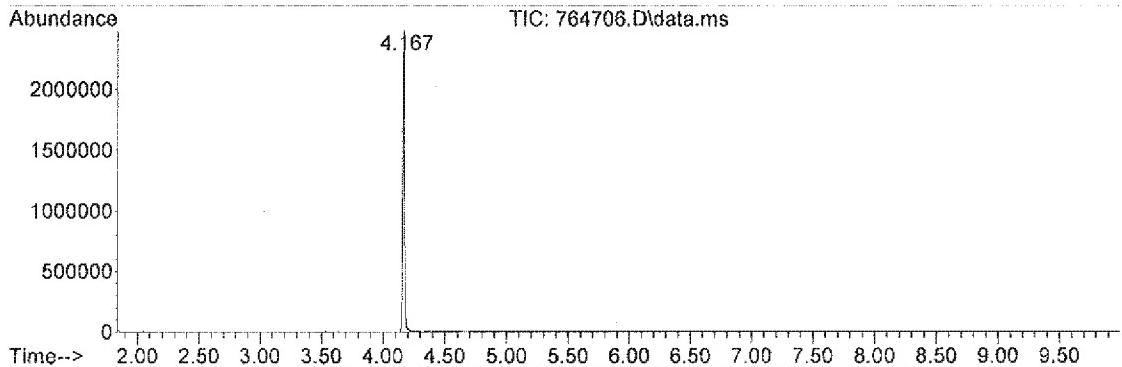
Area Percent / Library Search Report

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Operator : ASD/DJR  
Date Acquired : 10 Jan 2011 10:45  
Sample Name : COCAINE STD  
Submitted by :  
Vial Number : 6  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
4.167	2412174	100.00	100.00

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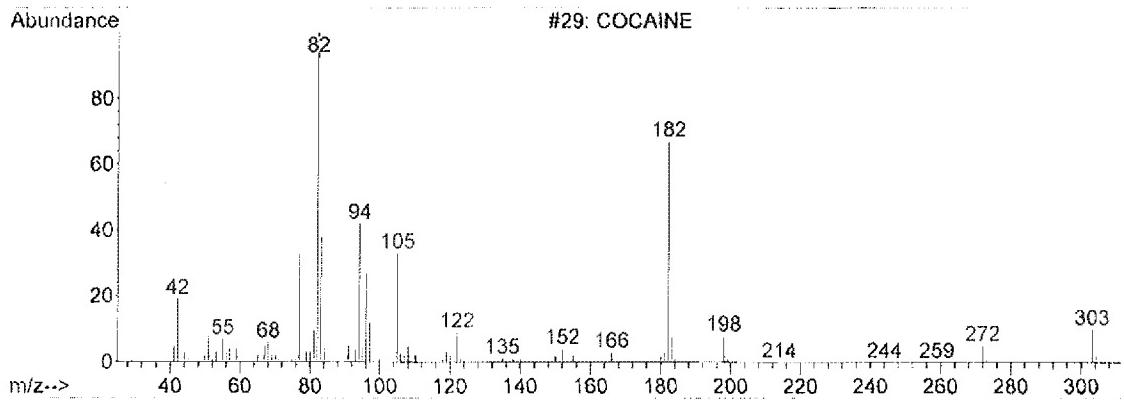
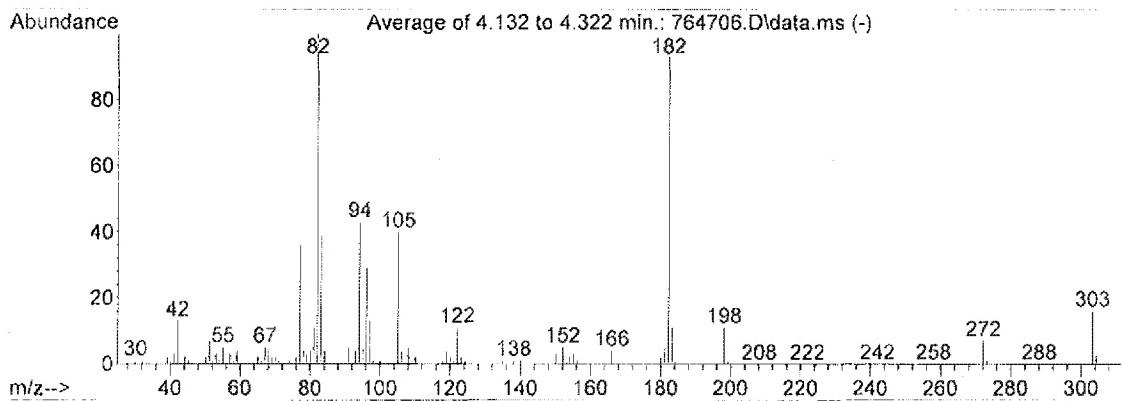
Area Percent / Library Search Report

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 Date Acquired : 10 Jan 2011 10:45  
 Sample Name : COCAINE STD  
 Submitted by :  
 Vial Number : 6  
 AcquisitionMeth: DRUGS.M  
 Integrator : RTE

Search Libraries:	C:\Database\SLI.L	Minimum Quality: 80
	C:\Database\NIST08.L	Minimum Quality: 80
	C:\Database\PMW_TOX2.L	

PK#	RT	Library/ID	CAS#	Qual
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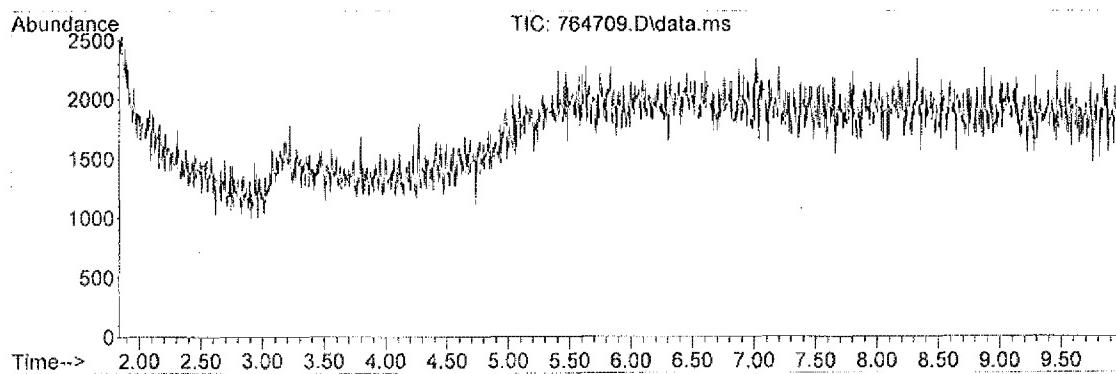
Area Percent / Library Search Report

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Date Acquired : 10 Jan 2011 11:24  
Sample Name : BLANK  
Submitted by : MGL  
Vial Number : 1  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
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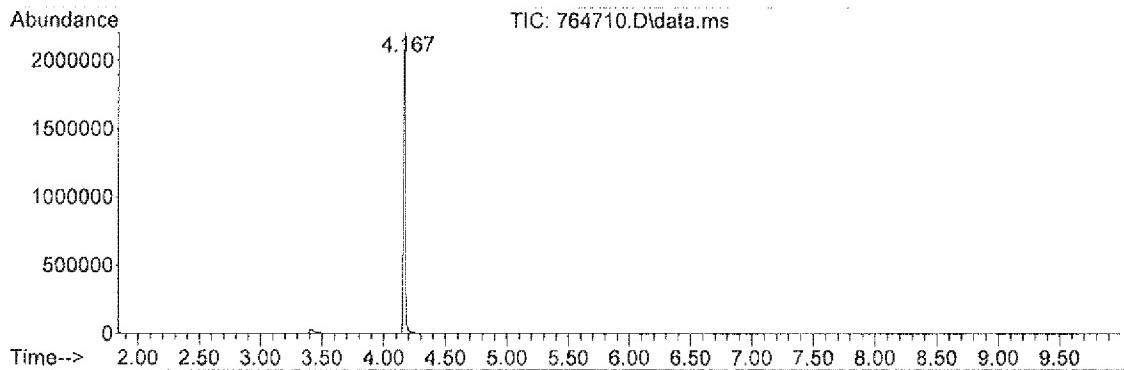
\*\*\*NO INTEGRATED PEAKS\*\*\*

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Operator : ASD/DJR  
Date Acquired : 10 Jan 2011 11:37  
Sample Name : [REDACTED]  
Submitted by : MGL  
Vial Number : 10  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
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Area Percent / Library Search Report

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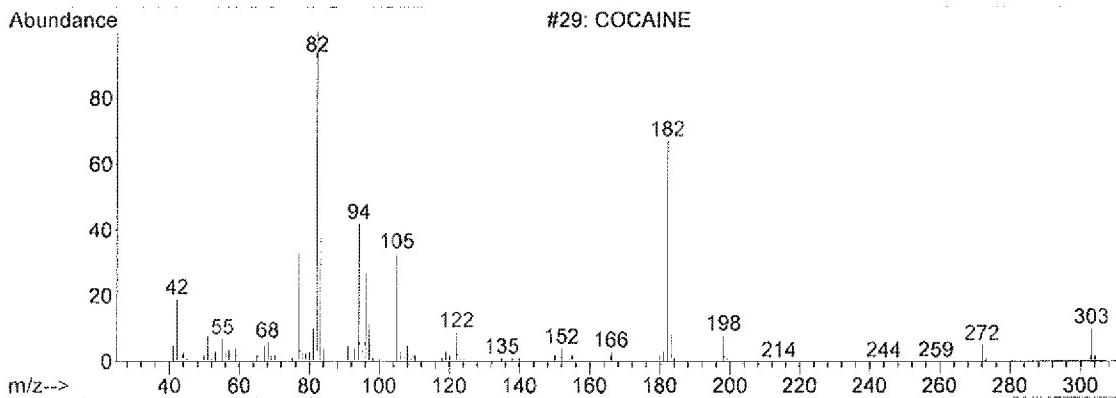
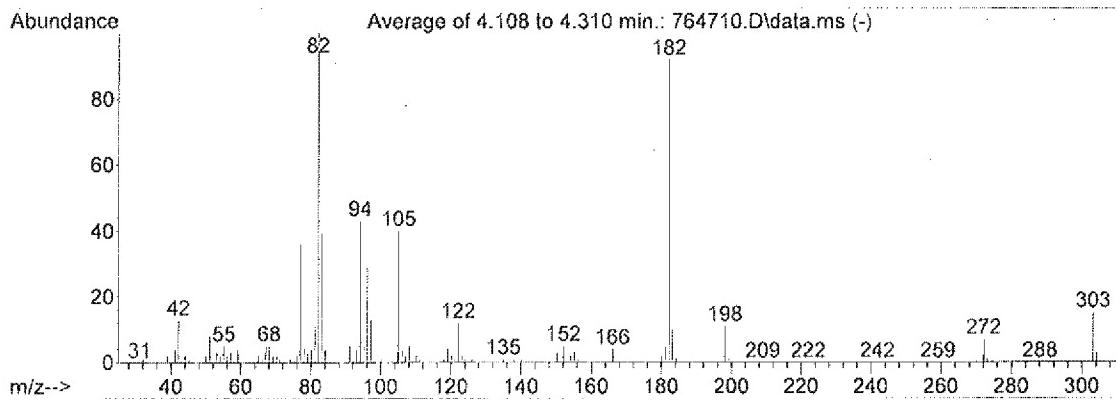
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Operator : ASD/DJR  
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Sample Name : XXXXXXXXXX  
Submitted by : MGL  
Vial Number : 10  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST08.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
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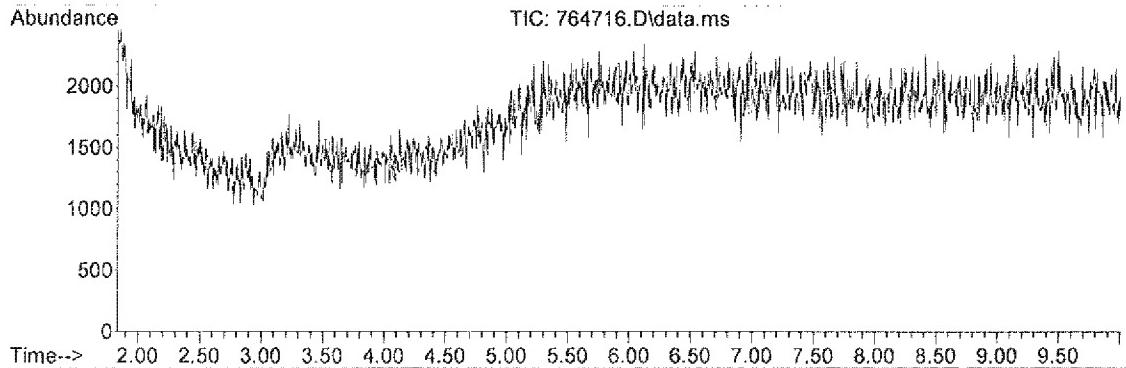


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Operator : ASD/DJR  
Date Acquired : 10 Jan 2011 12:56  
Sample Name : BLANK  
Submitted by :  
Vial Number : 1  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

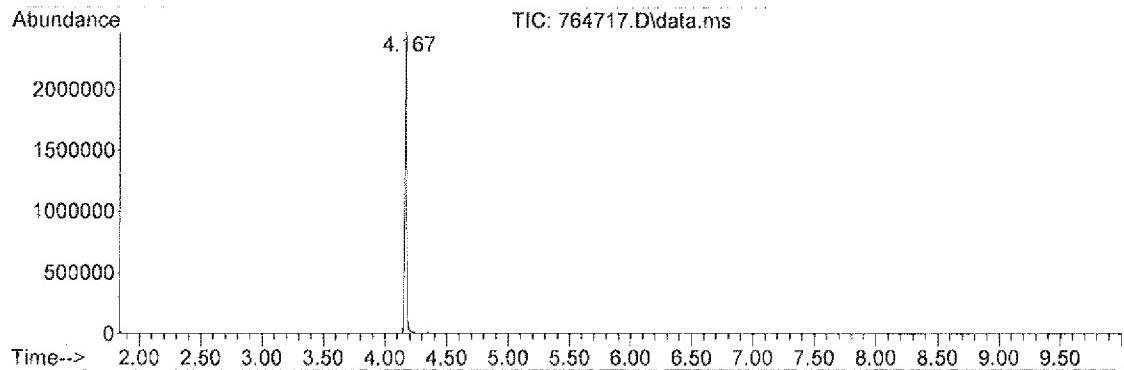
Area Percent / Library Search Report

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Operator : ASD/DJR  
Date Acquired : 10 Jan 2011 13:09  
Sample Name : COCAINE STD  
Submitted by :  
Vial Number : 6  
AcquisitionMeth: DRUGS.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
4.167	2436101	100.00	100.00

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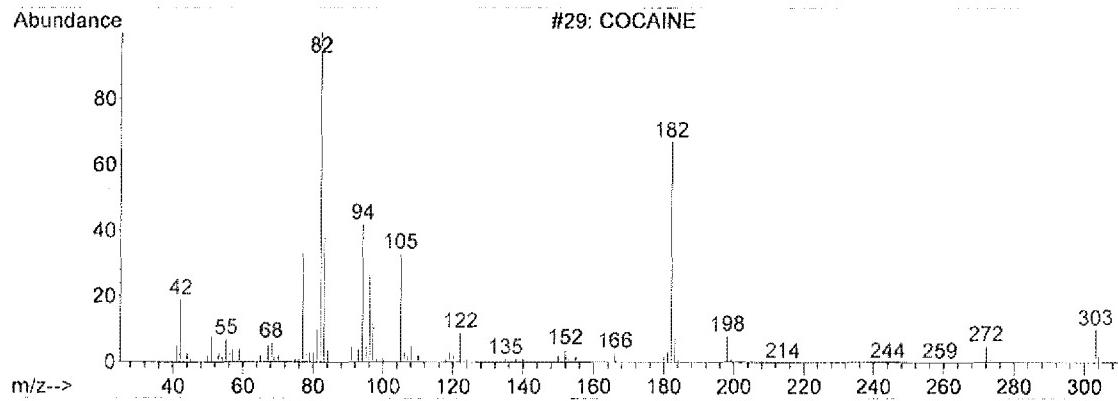
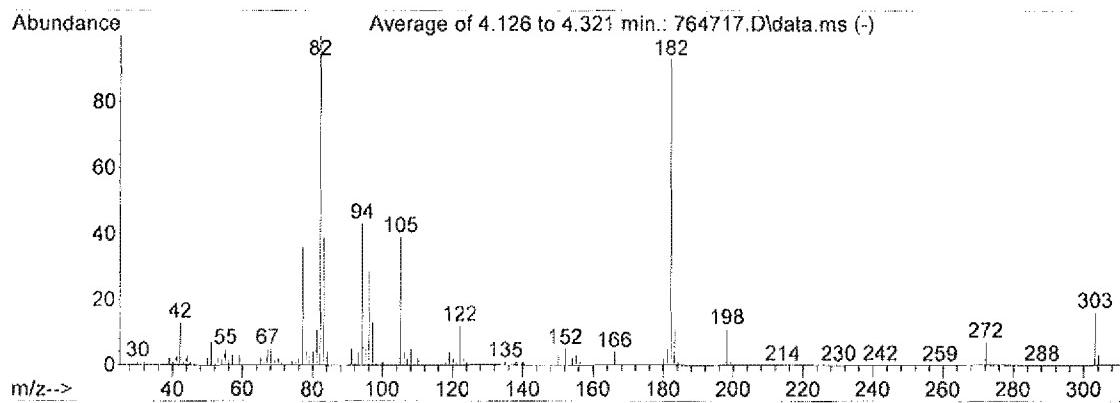
Area Percent / Library Search Report

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 Date Acquired : 10 Jan 2011 13:09  
 Sample Name : COCAINE STD  
 Submitted by :  
 Vial Number : 6  
 AcquisitionMeth: DRUGS.M  
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
 C:\Database\NIST08.L Minimum Quality: 80  
 C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.17	C:\Database\SLI.L COCAINE	000050-36-2	99



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